

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ERIN WILSON, *individually and on
behalf of others similarly situated,*

Plaintiff,

v.

McNamara Chiropractic LLC,

Defendant.

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CIVIL ACTION NO.
2:25-cv-00201-SCJ

**SECOND JOINT MOTION TO EXTEND DEADLINE FOR JOINT
PRELIMINARY REPORT AND DISCOVERY PLAN**

For good cause shown below, Plaintiff Erin Wilson, individually and on behalf of others allegedly similarly situated (“Plaintiff”), and Defendant McNamara Chiropractic LLC (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, respectfully move this Court for a brief fourteen (14) day extension of the deadline for the Parties to file a Joint Preliminary Report and Discovery Plan, through and including November 12, 2025. In support of this Motion, the Parties state good cause exists to grant the requested extension as follows:

1. The Parties are engaged in ongoing, substantive settlement discussions regarding the potential resolution of this matter on an individual basis. These discussions are active and progressing in good faith.

2. In light of the Parties' ongoing settlement discussions, the Court previously granted a two-week extension of the Parties' original deadline to submit a Joint Preliminary Report and Discovery Plan through October 29, 2025. [Doc. No. 19, 21.]

3. Additional time for is needed the Parties to continue their negotiations and, if appropriate, reflect any developments in the Joint Preliminary Report and Discovery Plan should further scheduling be necessary.

4. Indeed, the brief extension may allow the Parties resolve the claims at issue in this case, thereby eliminating the need for the Court to use its resources addressing them. As such, granting the request will further judicial economy and conserve resources.

5. The requested extension is sought in good faith, is not made for purposes of delay, and will not prejudice any party or unduly burden the Court.

WHEREFORE, the Parties respectfully request that the Court extend the deadline for filing a Joint Preliminary Report and Discovery Plan by fourteen (14) days from October 29, 2025 through November 12, 2025.

Respectfully submitted this 28th day of October 2025.

PARONICH LAW, P.C.

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CERTIFICATE OF SERVICE

I certify that on October 28, 2025, I electronically filed the foregoing
**SECOND JOINT MOTION TO EXTEND DEADLINE FOR JOINT
PRELIMINARY REPORT AND DISCOVERY PLAN** with the Clerk of the
Court using the CM/ECF system which will automatically send email notification
of such filing to the following attorneys of record:

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